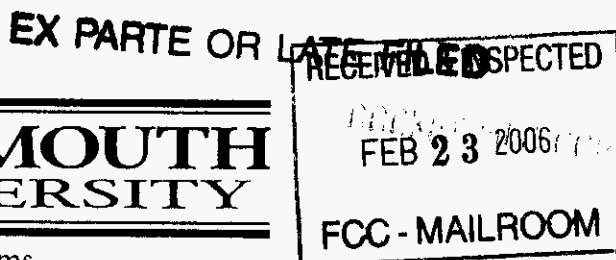


MONMOUTH UNIVERSITY

Information Systems



February 14, 2006

ORIGINAL

Ex Parte Presentation
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

Monmouth University writes this letter to express our concerns that a number-based contribution mechanism would have a substantial detrimental effect on this institution.

We have calculated that our per-year federal universal service obligation would increase from \$3192 per-year to over \$33,528 per-year if a number-based approach were adopted, assuming that the per-number fee was \$1.00.

We do not have budgetary flexibility to offset this significant increase. If adopted, the FCC's action may require cuts with respect to institutional services, including, but not limited to,

- the elimination of individual telephone service for students in campus housing.
- the reconfiguration of the campus network to an extension-based system under which the institution would maintain a single call-in number.
- the return of number resources over semester breaks and the elimination of number reserves earmarked for future campus priorities. The shift in policy with respect to maintaining number blocks would significantly impact campus community (and pose potential public safety concerns) with the elimination of the traditional four-digit dialing within the campus.
- the transition of budgeted funding from education and research-based programs to the telecommunications budget.
- delays in efforts to upgrade and modernize telecommunications facilities on campus, limiting our ability to invest in research networks, i.e., Internet2, and new innovative services and technologies.

No. of Copies rec'd _____
List A B C D E

The Act requires universal service contributions to be equitable, yet based on the current record in this proceeding, it remains unclear if a pure number-based approach could fully satisfy this basic requirement of Section 254.

We have further concerns with how non-number-based services, including special access services, would be assessed under a number-based approach, particularly with respect to double billing. Because many special access services already have associated numbers, there is no basis to separately assess special access services in addition to working numbers.

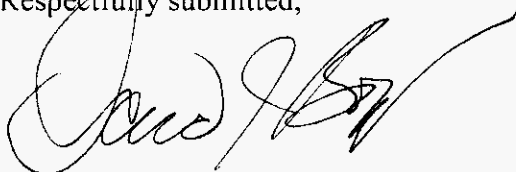
With technical advances in Interactive Voice Response (IVR) and Automated Attendant Systems enterprise, users will move towards single number services thusly having an adverse effect on the amount of contribution to the Universal Service Fee program.

It is our understanding that advanced data services for residential customers (DSL and cable modem service) are exempt from universal service obligations. The same exemption should apply equally to enterprise data services and special access services.

Monmouth University

- asks the FCC to proceed with caution in adopting a number-based plan that does not account for the specific concerns of colleges and universities
- supports efforts to modify a number-based proposal through a hybrid approach or through number equivalencies for enterprise customers (i.e., assessments based on PBX trunks not individual numbers).
- hopes the Commission modifies its universal service policies in a manner that reflects the potential impact on colleges and universities.
- suggests that no reform proposals be formally adopted by the Commission until such time as to the full impact of those proposals is studied and understood.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David J. Bopp', with a stylized flourish extending from the end.

David J. Bopp

Associate Vice President, Telecommunications & Network Operations

cc: Patricia L. Swannack, Vice President for Administrative Services